REMARKS

In the Office Action, the Examiner rejected claims 1-42 under 35 USC §103(a). These rejections are fully traversed below.

Claims 1, 15, 16, 18, 21, 23-25 and 27 have been amended to further clarify the subject matter regarded as the invention. Claims 1-42 remain pending in the application. Reconsideration of the application is respectfully requested based on the following remarks.

PATENTABILITY OF CLAIMS 1-42

In the Office Action, the Examiner rejected claims 1, 2, 4-9, 11, 12 and 39 under 35 USC §103(a) as being unpatentable over Kent ("The Complete Idiot's Guide to the Internet", Seventh Edition, 2001) in view of Groos, III et al. (US Patent Publication 2002/0026446); rejected claims 10 and 41 under 35 USC §103(a) as being unpatentable over Kent in view of Groos, III et al. and further in view of Book et al. (US Patent Publication 2003/0223566); rejected claim 42 under 35 USC §103(a) as being unpatentable over Kent in view of Groos, III et al. and further in view of Book et al. and still further in view of Carter et al. (US Patent 5,987,506); rejected claims 3, 13, 14 and 40 under 35 USC §103(a) as being unpatentable over Kent in view of Groos, III et al. and further in view of Griner et al. (U.S. Patent 6,614,729); rejected claims 15, 16-19, 21 and 22-26 under 35 USC §103(a) as being unpatentable over Kent in view of Carter et al.; rejected claim 20 under 35 USC §103(a) as being unpatentable over Kent in view of Carter et al. and further in view of Book et al.; rejected claims 27-31 and 33-35 under 35 USC §103(a) as being unpatentable over Kent in view of Griner et al.; rejected claim 32 under 35 USC §103(a) as being unpatentable over Kent in view of Griner et al. and further in view of Book et al.; rejected claims 36 and 37 under 35 USC §103(a) as being unpatentable over Kent in view of Griner et al. and further in view of Kronick ("Netscape Navigator Handbook", 1996); and rejected claim 38 under 35 USC §103(a) as being unpatentable over Kent in view of Griner et al. and Buswell et al. (U.S. Patent 6,836,885). These rejections are fully traversed below.

The Examiner relies on Chapter 19 of Kent which describes downloading of files, namely, use of File Transfer Protocol (FTP) to download files from the Internet.

In contrast, the claimed invention pertains to techniques for sharing data with other application programs. The techniques allow data sharing between different application programs on a computer system. For example, a second application program can access data provided by a first application program without requiring the first application program to be executing or running on the computer system. In one embodiment, an application program operates to publish

its data for external use by other application programs. The data is, for example, database data maintained by the application program. The data can be published for external use by producing a data communication file that contains at least a portion of the data. In one implementation, the data communication file contains the data being published for external use in a markup language representation.

Claim 1 pertains to a method for sharing media data between application programs operating on at least one computer system. The method, among other things, recites "accessing, by a second application program, a data communication file provided by a first application program, the first application program utilizing database data, and the data communication file being derived from the database data such that data internal to the data communication file is acquired from the database data" (claim 1, lines 4-7). In addition, the method of claim 1 recites "producing a user interface on the display using data internal to the data communication file;" (claim 1, lines 8-9).

In the Office Action, the Examiner points to page 267, lines 1-2 of Kent as corresponding to the accessing operation of claim 1. However, page 267, lines 1-2 of Kent merely indicates that a directory link can be clicked-on to display another Web document that shows the contents of that directory. Further, as to the producing operation in which a user interface is produced using data from the data communication file, the Examiner points to Figure 19.1 on page 267 of Kent. The Figure 19.1 merely depicts a browser window displaying a FTP site.

As clarified, claim 1 specifies that a first application program utilizes database data, and the data communication file being provided by the first application program is derived from the database data such that data internal to the data communication file is acquired from the database data. Hence, the data communication file is a specific type of electronic file that is produced to exchange media data between different application programs. Often, database data is provided in a proprietary format and thus not typically usable by other application programs. Hence, by providing the data communication file, these different application programs are able to share the database data.

In addition, as noted above, the method of claim 1 recites that a user interface is produced on the display screen using data internal to the data communication file. Here, the data communication file is accessed such that the data internal thereto is utilized in producing the user interface that is displayed. There is nothing in Kent that teaches or suggests that any of the files being transferred using FTP would be accessed to utilize their internal data. Hence, the transfer

of electronic files over the Internet using the FTP protocol as disclosed in Kent is not a means for sharing data between application programs as recited in claim 1.

More specifically, among other things, claim 1 recites: "the first application program utilizing database data, and the data communication file being derived from the database data such that data internal to the data communication file is acquired from the database data...." On page 3 of the Office Action, the Examiner admits that Kent fails to "teach utilizing a database and the data communication file being derived from the database data." However, in view of these recognized deficiencies, the Examiner references paragraphs 28 and 29 of Groos, III et al. However, paragraphs 28 and 29 of Groos, III et al. are not able to overcome the deficiencies of Kent. First, paragraph 27 of Groos, III et al. explains that a web server 160 and a host-side server 110 are operatively connected to a shared file database 150. As a result, at best, the web server 160 and the host-side server 110 can both access the database 150. The database 150 stores request files 153 and response files 157 which are being used for web server operations. Thus, Groos, III et al. does not teach or suggest deriving a data communication file from the database data. If anything, the request files 153 and the response files 157 in Groos, III et al. (paragraphs 28 and 29) are the database data, but nothing is taught or suggested as being derived therefrom. In the Advisory Action dated January 25, 2005, the Examiner points to Groos, III et al.'s authentication system being somehow used to provide a web page derived from database data. Applicants disagree and have clarified claim 1 such that the data communication file is derived from the database data such that data internal to the data communication file is acquired from the database data. Any web page presented by Groos, III et al. would not be derived from the database data such that data internal to the data communication file is acquired from the database data. Second, those skilled in the art would not be motivated to combine Groos, III et al. with Kent as proposed by the Examiner. Neither reference provides the ability for one program to share data with another program using a data communication file that is derived from database data. Therefore, it is submitted that claim 1 is patentably distinct from Kent.

Claim 15 pertains to a computer readable medium that includes at least computer program code for sharing media data between application programs. Among other things, claim 15 recites "computer program code for accessing, by a second program, a data communication file automatically produced and provided by a first program;" (claim 15, lines 4-6). Here, the computer program code operated by a second program accesses a data communication file that has been automatically produced and provided by a first program. By doing so, the second program gains access to the data in the data communication file that was provided by the first

program. In other words, data, namely, media data, can be shared between the different programs. There is nothing in Kent that teaches or suggests use of a data communication file that was automatically produced by one program so that another program is able to access the data in the data communication file.

To overcome the deficiencies of Kent, the Examiner relies on Carter et al. Specifically, the Examiner points to col. 23, lines 15-20 as allegedly teaching "automatically creating a data communication file." Applicant respectfully disagrees. Carter et al. at col. 23, lines 15-20 is discussing a coherent replication controller if a memory subsystem that "maintains coherency between cached pages ...". The coherent replication controller can automatically generate a copy of the data stored in each page and can store the copy in a memory device that is separate from the memory device of the original copy. This is done to provide fault tolerance in case a memory device fails. First, claim 15 concerns sharing media data between programs. Sharing data between applications has nothing to do with making a duplicate of cached pages for fault tolerance reasons. Second, the copying of cached pages is not for data sharing, nor does it yield a data communication file. Third, those skilled in the art would not be motivated to combine Carter et al. with Kent as proposed by the Examiner. Accordingly, it is noted that Kent fails to teach or suggest the computer readable medium recited in claim 15.

Claim 27 pertains to a computer system for sharing media data between application programs operating thereon. Here, the computer system includes a first application program, a data storage device, and a second application program. Here, both the first application program and a second application program operate on the <u>same computer system</u>. Although this limitation is present in the original claim, given the Examiner's statement otherwise in the Advisory Action mailed January 25, 2006, Applicants have clarified claim 27 in this regard. Hence, the FTP described in Kent would not be usable in such an environment. <u>Indeed, Kent itself specifically *teaches away* from the Examiner's conclusions. Namely, page 263, lines 10-11 of Kent states that FTP is for "transferring files from one computer to another."</u> Accordingly, it is submitted that Kent fails to teach or suggest the computer readable medium recited in claim 27.

In rejecting certain dependent claims, the Examiner relies on Groos, III et al., Carter et al., Greiner et al., Book et al., Kronick and or Buswell et al. to overcome certain deficiencies of Kent. However, none of the secondary references overcome the deficiencies noted above regarding Kent. Hence, even if one or more of the secondary references were properly

combinable with Kent, the combination would still fail to teach or suggest any of claims 1, 15 or 27.

Based on the foregoing, it is submitted that claims 1, 15 and 27 are patentably distinct from Kent, alone or in combination with Groos, III et al., Carter et al., Greiner et al., Book et al., Kronick and/or Buswell et al. In addition, it is submitted that dependent claims 2-14, 16-26 and 28-42 are also patentably distinct for at least the same reasons. The additional limitations recited in the independent claims or the dependent claims are not further discussed as the above-discussed limitations are clearly sufficient to distinguish the claimed invention from Kent, Groos, III et al., Carter et al., Greiner et al., Book et al., Kronick and/or Buswell et al. Thus, it is respectfully requested that the Examiner withdraw the rejection of claims 1-42 under 35 USC § 103(a).

SUMMARY

It is submitted that claims 1-42 are patentably distinct from the cited references. Reconsideration of the application and an early Notice of Allowance are earnestly solicited.

If there are any issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned attorney at the telephone number listed below.

Applicant believes that all pending claims are allowable and respectfully requests a Notice of Allowance for this application from the Examiner. Should the Examiner believe that a telephone conference would expedite the prosecution of this application, the undersigned can be reached at the telephone number set out below.

Applicants hereby petition for an extension of time which may be required to maintain the pendency of this case, and any required fee for such extension or any further fee required in connection with the filing of this Amendment is to be charged to Deposit Account No. 50-0388 (Order No. APL1P288).

Respectfully submitted,
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